

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS,	)	
JOHN MEINERS, and DANIEL UMPA	)	
individually and on behalf of all others	)	
similarly situated,	)	Case No. 4:23-cv-00788-SRB
	)	[Consolidated with 4:23-cv-00945-SRB]
Plaintiffs,	)	Hon. Stephen R. Bough
	)	
v.	)	
	)	
NATIONAL ASSOCIATION OF	)	
REALTORS, et al.	)	
	)	
Defendants.	)	

**NOTICE OF PENDING SETTLEMENT AND JOINT  
MOTION TO STAY CASE AS TO BAIRD & WARNER REAL ESTATE, INC.**

Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively, “Plaintiffs”) and Defendant Baird & Warner Real Estate, Inc. (“Baird & Warner”) (together with Plaintiffs, the “Parties”) respectfully provide notice to the Court that the Parties have reached a binding term sheet to settle all claims asserted against Baird & Warner in the above-captioned consolidated action as part of a proposed nationwide class settlement. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will file a motion in this Court for preliminary approval of the proposed settlement.

The Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to Baird & Warner to preserve the resources of Plaintiffs, Baird & Warner, and the Court, and to seek preliminary and final approval of the settlement.

The Parties agree that this Notice and the stay requested herein shall not constitute a waiver of any claims or defenses, including but not limited to: (a) any jurisdictional defenses that may be

available under Rule 12 of the Federal Rules of Civil Procedure, statutory law, or common law (including but not limited to personal jurisdiction defenses), (b) any affirmative defenses that may be available under Rule 8 of the Federal Rules of Civil Procedure, statutory law, or common law, or (c) any other statutory or common law defenses that may be available to Baird & Warner in this or any other related actions.

Dated: November 26, 2024

Respectfully submitted,

By: /s/ Alexander W. Aiken

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*Attorneys for Defendant Baird & Warner Real Estate, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on November 26th, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

By: */s/ Alexander W. Aiken*  
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